

Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT,
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

HUONG HOANG, an individual,

Plaintiff,

vs.

AMAZON.COM, INC., a Delaware
corporation, and IMDB.COM, INC., a
Delaware corporation,

Defendants.

NO. 11-cv-01709-MJP

**DECLARATION OF HUONG
HOANG IN OPPOSITION TO
DEFENDANTS' MOTIONS FOR
SUMMARY JUDGMENT**

I, Huong Hoang, do declare and attest as follows on the basis of my personal knowledge:

1. I am a party in the above lawsuit, am over the age of eighteen years of age, and competent to testify to the matters stated herein.

2. When I asked IMDb to remove the incorrect 1978 year of birth from the "Junie Hoang" profile, an IMDb representative demanded that I send a copy of my passport to prove that the 1978 year was incorrect. I was uncomfortable providing such a private personal identification document to an unknown representative at IMDb. I also did not want IMDb to find out my actual age or legal name because I knew IMDb could use that information to find my real birth date. I was concerned that IMDb would post my real date of birth, even though I have purposely worked to keep that information private.

3. In all of my correspondence with the IMDb helpdesk and the IMDb

1 customer support telephone line, I was always careful to ask that the 1978 date of birth be
2 removed, not replaced or updated. IMDb never asked my permission to conduct a public
3 records search, or to seek my name or date of birth from outside sources. I never
4 consented to IMDb's search of PrivateEye.com, nor would I have consented if I would
5 have known IMDb would conduct such a search.

6 4. My initial list of acting income by year, bates stamped HOANG 000021-
7 23, did not include some of my smaller acting projects. During the discovery process, I
8 updated this list to include these smaller projects, and to move some projects to different
9 years to more accurately reflect the year I worked on the project, as opposed to the
10 release year. These changes are reflected in the document bates stamped HOANG
11 000167-69 and HOANG 000164-66. I recently looked at my records and verified the year
12 in which I acted in specific projects. Based on my verifications, the document attached as
13 **Exhibit A** is a true and correct representation of the acting projects I worked on between
14 2005 and 2011. These minor changes caused slight variations in the total acting incomes
15 disclosed in the case.

16 5. Attached as **Exhibit B** is a true and correct copy of the notes I took
17 regarding the year I was cast and acted in each project listed on my IMDb profile.

18 6. I regularly receive payment in cash or check for most of my acting jobs. I
19 do not include payments for acting work on my income tax forms when I am not given a
20 W2 or 1099 tax statement, as it is not required.

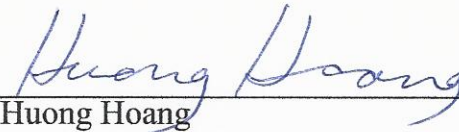
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1 I certify and declare under the penalty of perjury under the laws of the United
2 States that to my knowledge the foregoing is true and correct.

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4 Executed this 17th day of December, 2012 at Los Angeles, California.

5
6 
7 Huong Hoang